# IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

UNITED STATES OF AMERICA	)
Plaintiff,	)
v.	) No. 4:17-CR-519 RLW
LONZO PATRICK	)
Defendant.	)

## MOTION TO CONTINUE THE TRIAL DATE

Comes now Defendant, Lonzo Patrick, through his attorney, Melissa Goymerac, Assistant Federal Public Defender, and requests this Court continue the trial date in this case. In support thereof, Defendant states the following:

- 1. This matter is set for trial on August 6, 2018.
- 2. Counsel requires additional time to investigate Mr. Patrick's background and history in anticipation of a negotiated disposition of this matter that will not require a trial.
- 3. A continuance in this matter is in the interests of justice as it allows a reasonable time for counsel to be properly prepared pursuant to 18 U.S.C. §3161.
- 4. The government has no objection to this request.
- 5. Counsel has attached a recently executed Speedy Trial Waiver.
- 6. Defendant requests the trial of this matter be continued for 60 days and reset on a date convenient for this Court.

WHEREFORE, defendant requests this Court grant his request to continue the trial of this matter from August 6, 2018 for 60 days, and reset on a date convenient for this Court.

Respectfully submitted,

/s/ Melissa K. Goymerac MELISSA K. GOYMERAC Assistant Federal Public Defender 1010 Market Street, Suite 200 St. Louis, Missouri 63101 Telephone: (314) 241-1255 Fax: (314) 421-3177

E-mail: Melissa\_Goymerac@fd.org ATTORNEY FOR DEFENDANT

## **CERTIFICATE OF SERVICE**

I hereby certify that on August 2, 2018, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon John Bird, Assistant United States Attorney.

Respectfully submitted,

/<u>s/ Melissa K. Goymerac</u>
MELISSA K. GOYMERAC
Assistant Federal Public Defender

## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

UNITED STATES OF AMERICA	)
Plaintiff,	)
v.	) No. 4:17-CR-519 RLW/DDN
LONZO PATRICK	)
Defendant.	)

#### WAIVER OF SPEEDY TRIAL

Comes now Defendant LONZO PATRICK, and executes this Waiver of a Speedy Trial, Title 18 U.S.C.§3161, et seq. He further states to the Court that he has been advised by counsel and understands that the statute, commonly known as the Speedy Trial Act, provides time limits to insure that a criminal case proceeds to a conclusion without unnecessary delay at any stage; that ordinarily a trial is scheduled to start not less than thirty (30) days from the date when the Defendant first appeared with counsel or more than seventy (70) days from the time the Defendant entered a plea of not guilty; and that certain periods of delay would be excluded from calculating the seventy (70) day limitation.

Defendant further states to the Court that he believes the ends of justice would best be served by executing said Waiver and such Waiver would outweigh the interests of the public and the Defendant to a speedy trial.

WHEREFORE, Defendant moves this Court to accept this Waiver of his rights under the Speedy Trial Act.

LONZO PATRICK

Respectfully submitted,

/s/Melissa K. Goymerac MELISSA K. GOYMERAC, #83550VA Assistant Federal Public Defender 1010 Market Street, Suite 200 St. Louis, Missouri 63101 Telephone: (314) 241-1255 Fax: (314) 421-3177

E-mail: Melissa\_Goymerac@fd.org

ATTORNEY FOR DEFENDANT

## **CERTIFICATE OF SERVICE**

I hereby certify that on August 1, 2018, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon John Bird, Assistant United States Attorney.

/s/Melissa K. Goymerac MELISSA K. GOYMERAC Assistant Federal Public Defender